

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Aaron Abadi,)
)
Plaintiff,) DECLARATION OF CRAIG
vs.) THOMAS IN SUPPORT OF QATAR
American Airlines Group, Inc., <i>et al.</i> ,) AIRWAYS GROUP Q.C.S.C.
Defendant.) MOTION TO DISMISS
)
) Civil Action No. 1:23-cv-04033-LJL

I, Craig Thomas hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.
2. I am the Vice President of Sales at Qatar Airways Group Q.C.S.C. (sued herein as “Qatar Airways Q.C.S.C. d/b/a Qatar Airways Q.C.S.C. Corporation” and hereinafter “Qatar Airways”) with a business address of 350 Fifth Avenue, Suite 7600, New York, NY, and have been employed in this position since August 23rd, 2021.
3. My duties and responsibilities include defining and executing the overall sales strategy for Qatar Airways in the Americas.
4. As the VP of Sales, I am fully familiar with Qatar Airways’ corporate structure as well as records, databases, standard practices regarding the ticketing of passengers transported by Qatar Airways and Qatar Airways’ Customer Contact Centre.
5. I submit this Declaration in support of the Qatar Airways Motion to Dismiss.
6. I am fully familiar with the facts and allegations contained in Plaintiff’s Complaint and Supplemental Complaint and submit this Declaration based upon my personal knowledge except where I have stated facts to be based upon information and belief, my review of the records

of Qatar Airways that are created and maintained in the regular course of its business and the Complaint and Supplemental Complaint filed by Plaintiff in this action.

7. As to facts based upon information and belief, I believe them to be true based upon information given to me by employees of Qatar Airways, or through documents which I have reviewed in the course of my duties.

8. Qatar Airways is a State of Qatar air carrier and engaged in the business of the carriage by air of passengers, baggage and cargo.

9. Qatar Airways is a corporation organized and existing under the laws of the Doha, State of Qatar.

10. Qatar Airways maintains its headquarters and principal place of business in Doha, State of Qatar.

11. Qatar Airways has never maintained a principal place of business in any state in the United States, including New York or Texas.

12. On November 4, 2021, a Qatar Airways Customer Contact Centre employee responded to an e-mail from Aaron Abadi advising him of the Qatar Airways mask mandate. A copy of the e-mail is attached to Plaintiff's Complaint at Exhibit 60.

13. At all times relevant to the Complaint, the office for Qatar Airways' Customer Contact Centre was, and currently is, located in Doha, State of Qatar.

14. Qatar Airways' Customer Contact Centre handles general day to day customer queries.

15. In November 2021, as required by U.S. federal law, Qatar Airways imposed a mask mandate for travel on flights to and from the United States.

16. At the time of the signing of this Declaration, Qatar Airways no longer has a mask mandate for travel on any Qatar Airways flights.

17. According to Qatar Airways records, Aaron Abadi did not:

- enter into or purchase a contract of carriage by air on Qatar Airways between November 2021 and the present; and
- did not travel on any Qatar Airways flight between November 2021 and the present.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 10th, 2024



Craig Thomas